

SHER TREMONTE LLP

May 19, 2020

**VIA ECF**

Honorable Nicholas G. Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *United States v. Raniere, et al.*, 18 Crim. 204 (NGG)**

Dear Judge Garaufis:

I write to respectfully request a temporary modification of Kathy Russell's bond conditions to allow her to travel to Jacksonville, Florida via car to accompany her sister to an appointment with a specialty doctor. Ms. Russell would leave from and return to Georgia on Tuesday, June 2. Your Honor granted a similar request on April 30, 2020, allowing Ms. Russell to support her sister with the same pressing medical issue at a May 6 appointment. Ms. Russell's sister has an appointment on June 2 for another round of treatment, and Ms. Russell would appreciate the opportunity to assist her sister at this appointment and be available to drive her home if needed.

The government, by AUSA Tanya Hajjar, and Pretrial Services do not object to Ms. Russell's request. I have provided proof of the doctor's appointment to Pretrial Services.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Justine A. Harris

Justine A. Harris

cc: All Counsel (via ECF)

APPLICATION GRANTED.  SO ORDERED. /s/ Nicholas G. Garaufis Hon. Nicholas G. Garaufis Date: May 19, 2020
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